

EXHIBIT E

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

THE UNITED STATES OF AMERICA

ex rel. JULIE LONG,

Plaintiffs,

Civil Action No.

vs.

16-12182-FDS

JANSSEN BIOTECH, INC.,

Defendant.

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The above-captioned deposition of MICHAEL WOLFE was held via Zoom videoconference on Tuesday, November 16, 2021, commencing at 10:11 a.m., before Steven Poulakos, Notary Public.

REPORTED BY: Steven Poulakos, RPR

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1 what education they needed in order to help support
2 patients who were being infused and then discuss
3 whether there was budget and then process for
4 confirming and moving forward in the development.

5 Q Once you had that discussion with the
6 individual, what would then happen? And by that, I
7 mean would they go back and talk amongst themselves
8 about a potential program to address the concerns or
9 issues that the ABSs were having in the field or would
10 you do something or both of you together, something of
11 that sort?

12 A It would vary as I recall from time to time
13 and what the topic was. Frequently one of the two
14 field directors and I would speak to an external
15 partner to begin developing an appropriate educational
16 program.

17 Q And when you say external partner, I think
18 I know what you mean, but could you explain it for us,
19 please?

20 A Yes. We had a couple of external partners.
21 Depending on the topic, one would be a partner that
22 helped to develop -- that brought expertise to the
23 topic of infusion offices. The second is a external
24 partner that was an expert in policy such as Medicare
25 and Medicaid and payer coding and reimbursement. And

1 then the third was a what we used to call boutique
2 marketing firm that would actually develop slide decks.

3 Q Would these three different external
4 partners work in conjunction with each other or they
5 would always work separately and apart from each other?

6 A It depended on the topic.

7 Q Could you identify the three external
8 partners? When we say external, I'm assuming you're
9 talking about companies that are not part of Janssen or
10 J&J. These were independent third-party companies?

11 A Correct.

12 Q Could you give me the names of them,
13 please?

14 A Xcenda Resource Group, T -- these are
15 initials. TJ Paul, P-A-U-L, and there was a fourth.
16 They somehow worked with Xcenda. It was called Lash as
17 I recall.

18 Q Could you tell us the purpose of going to
19 the marketing department first? And by that, I mean
20 was it to get approval to go to the next step of
21 working with one of these third-party vendors for
22 educational materials?

23 MS. GRIGSBY: Objection to form.

24 THE WITNESS: Typically the process is -- I
25 mean, my -- my boss, the director of marketing, owned